

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:) **18-30870**
)
ALFREDA COBURN THOMPSON,) **Chapter 13**
)
Debtor.) **Hon. Judge: CASSLING**

NOTICE OF MOTION

To the following persons or entities who have been served via electronic mail:

U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov

Tom Vaughn, Chapter 13 Trustee: ecf@tvch13.net

To the following persons or entities who have been served via U.S. Mail:

See attached list.

Please take notice that I shall appear before the following named Bankruptcy Judge, or any other Judge presiding in his stead at 219 S. Dearborn Street, Chicago, IL 60604, and in the following courtroom (or any other place posted), and present the attached **Motion to Modify Chapter 13 Plan**, at which time and place you may appear.

JUDGE: Cassling
ROOM: 619
DATE: August 22, 2019
TIME: 9:30 AM

PROOF OF SERVICE

The undersigned certifies that copies of this Notice and attachments were served to the listed persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, on or before July 30, 2019, at 5:30 p.m., with proper postage prepaid, unless a copy was provided electronically by the Bankruptcy Court.

DATE OF SERVICE: July 30, 2019

/s/ Robert C. Bansfield Jr.

Robert C. Bansfield Jr., A.R.D.C. #6329415

Attorney for the Debtor(s)
DAVID M. SIEGEL & ASSOCIATES
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-8100

To the following persons or entities who have been served via U.S. Mail:

Alfreda Coburn Thompson
125 S. Austin, #1
Chicago, IL 60644

COMCAST
PO BOX 1931
Burlingame, CA 94011

City of Chicago Department of Finance
c/o Arnold Scott Harris P.C.
111 W Jackson Blvd Ste 600
Chicago, IL 60604

City of Chicago Department
Of Administrative Hearing
City of Chicago - DOAH C/O Arnold Scott
111 W. Jackson Ste 600
Chicago, IL 60604

Santander Consumer USA, Inc.
d/b/a Chrysler Capital
P.O. Box 961275
Fort Worth, TX 76161-1245

Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-9617

Illinois Department of Revenue
Bankruptcy Unit
PO BOX 19035
Springfield, IL 62794-9035

Great American Finance
20 N Wacker Dr Ste 2275
Chicago, IL 60606

Bank of America, N.A.
P O Box 982284
El Paso, TX 79998-2238

AT&T Mobility II LLC
% AT&T Services Inc.
Karen A. Cavagnaro Lead Paralegal
One AT&T Way, Suite 3a104
Bedminster, NJ 07921

NPRTD Illinois, LLC
256 West Data Drive
Draper, UT 84020

Portfolio Recovery Associates, LLC
POB 41067
Norfolk, VA 23541

Ashro Lifestyle
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380

Scolopax, LLC
C O Weinstein & Riley, PS
2001 Western Avenue, Ste 400
Seattle, WA 98121

America's Financial Choice
2 W. Madison St, 2nd FL.
Oak Park, IL 60302

US Department of Education/MOHELA
633 Spirit Dr
Chesterfield, MO 63005

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ALFREDA COBURN THOMPSON,) **Chapter 13**
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Debtor.) **Hon. Judge: CASSLING**

MOTION TO MODIFY CHAPTER 13 PLAN

NOW COMES the Debtor, **ALFREDA COBURN THOMPSON**, by and through her attorneys, David M. Siegel & Assoc., LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois Eastern Division.
- 2) Debtor filed a petition for relief under Chapter 13 of Title 11 USC on November 1, 2018.
- 3) The current plan requires payments of \$450.00, per month with General Unsecured Creditors receiving not less than 10% of allowed claims.
- 4) Debtor is currently in default on her plan payments because her plan initially required two payments of \$800.00 and a payment of \$850.00 without proper payroll deductions for those amounts being sent to the Trustee. Her plan payments are now \$450.00 per month with payroll deductions being sent into the Trustee.
- 5) Debtor can maintain her current plan payments but cannot cure her default.
- 6) Debtor seeks to modify her plan under 11 U.S.C. § 1329 and defer the current default in plan payments to the end of the plan.
- 7) The plan will complete within 60 months if the Debtor's motion is granted and unsecured creditors will still receive no less than 10% of their allowed claims.

8) Debtor requests the above relief without any intent to defraud her creditors.

WHEREFORE, the Debtor, ALFREDA COBURN THOMPSON, prays that this Honorable Court enter an Order to Modify the Chapter 13 Plan and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Robert C. Bansfield Jr.

Robert C. Bansfield Jr., A.R.D.C. #6329415
Attorney for the Debtor

David M. Siegel & Associates, LLC
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